

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application by Qwest Communications)
International Inc. for Provision of)
In-Region, InterLATA)
Services in Montana, Utah, Washington)
and Wyoming)
_____)

CC Docket No. 02-189

DECLARATION OF SHERRY LICHTENBERG

1. My name is Sherry Lichtenberg. I have twenty years of experience in the telecommunications market. Prior to joining WorldCom, Inc., I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management. I have been with WorldCom, Inc. for six years. I am currently employed by WorldCom, Inc. as a Senior Manager in the Mass Markets local services team. My duties include designing, managing, and implementing WorldCom's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing in Qwest and elsewhere. I participated in the drafting of the initial Qwest test development document and provided advice and consultation to the WorldCom team that participated in the day to day testing activities. I have been involved in OSS proceedings throughout the country.
2. Qwest has applied for section 271 authorization while significant deficiencies exist in its OSS and while much about its OSS remains completely unknown. I agree with Qwest that it has worked with CLECs in the last two years to significantly improve its OSS and

to develop a third-party test of that OSS. Qwest should be complimented on its progress.

But that does not mean that Qwest's OSS is ready.

3. The fact is that Qwest did not even begin making serious efforts to develop adequate OSS until several years after passage of the Telecommunications Act. It is also my understanding that until very recently, Qwest's prices for leasing UNEs were so high that competitors could not come close to making profits through local entry. As a result of these barriers to entry, Qwest is the last region of the country in which local competition has begun to develop.
4. To date, unlike in other regions in which BOCs have applied for section 271 entry, Qwest has very little commercial experience on which to rely that shows its OSS is ready, at least with respect to the unbundled network elements platform ("UNE-P"), the only entry vehicle that can today support broad-based entry for residential and small business markets. Neither of the two national CLECs that are using UNE-P as a primary entry strategy, WorldCom or AT&T, even entered the Qwest region until very recently. Other CLECs like Eschelon have used a special Qwest UNE-P like product whose ordering and provisioning rules may or may not mirror those of the true UNE-P product. And those CLECs ordered this product under special business rules and with special Qwest support.
5. WorldCom finally entered parts of the Qwest region in mid-April 2002 and began providing its Neighborhood product, a product that combines local and long distance service and specific features. It did so in partnership with Z-Tel, which is transmitting the orders via Z-Tel's OSS interfaces, interfaces that were constructed by Accenture. As of now, however, WorldCom is transmitting very few orders per week to Qwest through

Z-Tel's systems. In contrast, in individual *states* in other regions, WorldCom is transmitting 3,000 to 5,000 orders *per day*.

6. Qwest boasts that as of April 30, 20002, it had in service 3,902 UNE-P combinations in Montana, 19,937 in Utah, 47,961 in Washington and 27,024 in Wyoming. Qwest Comments at 17. This is a tiny number of customers that it has provisioned since it first began providing service. And many of these orders – perhaps most – were not placed via EDI, the only interface capable of supporting high volume entry. Indeed, Qwest's performance measures show that region-wide, Qwest received only 6,417 UNE-P orders via EDI in June, its highest volume month to date. (Performance Reports, PO-2A-2, 2A-1). This would be a paltry number of orders for one state much less an entire region and can hardly serve to show that Qwest's OSS is ready to serve commercial volumes of orders. Indeed, in its evaluation of Qwest's first section 271 application, the Department of Justice noted the low market penetration for residential UNE-P that "may reflect the higher UNE pricing that was in effect for most of the period preceding this application." DOJ Qwest I Eval. at 13.
7. In assessing, the readiness of Qwest's OSS, it is also important to remember that Qwest's OSS is not fully regional. Because the Qwest region is divided into three sub-regions, KPMG reported results for each of these sub-regions in the third party test. Colorado, Idaho, Montana, New Mexico, Utah, and Wyoming are in the Central sub-region; Iowa, Minnesota, Nebraska, North Dakota, and south Dakota are in the Eastern sub-region, and Washington and Oregon are in the Western sub-region. Thus, even if Qwest had

significant commercial experience in one of its sub-regions, Qwest could not rely on that experience to show that its OSS is ready region wide.¹

8. Moreover, Qwest has apparently inflated the number of UNE-P lines by including in its calculation a unique product called UNE-E that was developed for Eschelon, as well as other unique products developed for other carriers, as well as all the lines included in UNE-P Centrex orders. Eschelon submitted affidavits in a number of states describing its experience with UNE-E, but the states did not accept these affidavits. (The affidavits were submitted late because it was only late in the day that Eschelon was relieved from a secret deal it made with Qwest in which it had agreed not to describe its experience.) In these affidavits Eschelon indicated that Qwest unilaterally changed the reporting of UNE-E lines to UNE-P, thus inflating the number of UNE-P lines in its reporting. At the same time, however, Qwest did not capture in its performance measures the substantial problems Eschelon experienced on these UNE-E lines, including inaccurate provisioning, inaccurate wholesale bills and inaccurate daily usage feeds – all of which continue to be problems as discussed below. In any case, even with the inclusion of Eschelon lines and Centrex lines, Qwest has processed few UNE-P orders.
9. Because of the dearth of commercial experience, Qwest is forced to rely almost entirely on the third-party test to prove the readiness of its OSS. In contrast, in other regions, the BOC was always able to rely on commercial experience in at least one state in its region

¹ The Department of Justice indicates that Qwest's OSS is regional and can be evaluated on a regional basis. DOJ Qwest I Eval. at 6-7. But the third party test sent separate test transactions in each of Qwest's three sub-regions because it could not be presumed the OSS was identical throughout the region. KPMG's regionality study concluded there were differences between the three sub-regions and Qwest agreed with this. Moreover, Qwest has recently relied on differences in OSS between the three sub-regions to justify different performance. It has, for example, explained that it takes less time to update Customer Service Records in one of the three sub-regions than the others.

in conjunction with a third-party test. Because Qwest lacks such experience, the Commission should scrutinize the third-party test results very closely.

10. Close scrutiny reveals that Qwest's OSS is not ready. Unlike third-party tests in other regions, the third-party test here concluded while KPMG continued to deem Qwest's performance unsatisfactory with respect to a number of important issues. The third-party test also concluded with a number of important issues unresolved because Qwest unilaterally determined that certain issues should not be retested. On still other important issues, Qwest escaped a finding of unsatisfactory performance because KPMG did not pass judgment on so-called "diagnostic" test criteria. In contrast, in other regions, KPMG exercised its judgment to determine whether performance was satisfactory with regard to similar issues.. Those are hardly the kind of results that show Qwest's OSS to be fully ready.
11. Moreover, as with any third-party test, this one certainly did not ferret out all of the important deficiencies that exist. In particular, because the third-party testers followed Qwest's documented procedures and assessed Qwest's performance, they did not assess whether Qwest's procedures themselves were adequate. For example, they did not discuss Qwest's failure to offer important functionality to allow CLECs to submit migration orders by name and telephone number ("migrate by TN") without an address.
12. With WorldCom's recent entry into the Qwest region, it has begun more carefully evaluating Qwest's OSS than it did at a time when it was clear that entry in the Qwest region was prohibitively expensive and also foreclosed by clearly inadequate OSS. We have determined that a number of serious deficiencies exist with Qwest's OSS, deficiencies that were not discussed in the third-party test. It is likely that there are other

significant deficiencies that will be revealed as commercial experience grows, as has been the case in every other region.

13. But even at today's low order volumes, it is clear that Qwest's complex OSS processes force WorldCom to spend far more time to place an order in the Qwest region than elsewhere, requires more development resources, and leads to an extremely high reject rate.
14. In July (through July 12), Qwest has rejected 32.5% of WorldCom's orders region-wide. This is far higher than the reject rate in other regions in which WorldCom is offering its Neighborhood products in conjunction with Z-Tel. The average reject rate in those regions during the same period in July was 16.8%, approximately half the rate in the Qwest region. (The reject rates on orders submitted through WorldCom's legacy systems in these other regions was lower still.)² In the SWBT region, for example, the reject rate in July was 11.4% on WorldCom orders placed through Z-Tel, and in the BellSouth region it was 14.1%. In each of these regions, WorldCom first began submitting orders through the Z-Tel systems in April of this year, as it did in the Qwest region, thus the reject rates should be similar if Qwest's systems are comparable to those in other regions.
15. WorldCom's high reject rate in the Qwest region is not an aberration. It is similar to that of other carriers and to KPMG's experience during testing. Region-wide, Qwest rejected 34% of orders received via the IMA GUI in April and 31% of orders received via EDI. (Performance Reports, PO-4A-1, 4A-2, 4B-1, 4B-2). In May, Qwest rejected 35% of

1. As we explained in response to BellSouth's Georgia/Louisiana application last Fall, the reject rate on WorldCom's UNE-P migration orders placed through its legacy systems in Michigan from January through August 2001 was 10.6%, 11.6% in Illinois, 11.9% in Pennsylvania, 14.6% in Texas, and 17.9% in New York (where a systems problem temporarily increased the reject rate for three months significantly above normal levels). After BellSouth implemented migrate by telephone number, WorldCom's reject rate in BellSouth fell into line with those in other regions.

orders received via IMA and 30% received via EDI. In June, Qwest rejected 37.8% of the orders it received from all CLECs via the IMA GUI and rejected 32.3% of the orders it received via EDI. (Perf Reports, PO-4A-1, 4A-2, 4B-1, 4B-2).

16. Similarly, during the test, KPMG found reject levels of 33.6% in the Eastern region, 40.5% in the Central region, and 32.1% in the Western region – using interfaces that supposedly had been integrated. Because the level of rejects was considered a diagnostic measure, KPMG did not fail Qwest based on these reject levels. But these levels are staggeringly high.
17. The reason that reject rates are far higher in Qwest than elsewhere and that placement of orders is more complicated in Qwest than elsewhere is that critical OSS deficiencies exist in Qwest: (1) Qwest requires CLECs to perform an address validation function using the customer's full service address prior to pulling a Customer Service Record ("CSR"); (2) Qwest requires CLECs to place a service address on every order; (3) Qwest requires CLECs to place a special customer number ("cus code") on every order; (4) Qwest often returns multiple CSRs for a single customer; (5) Qwest requires CLECs to list the customer's pre-existing line class of service and some pre-existing features on every order; (6) and Qwest often takes more than a week to update a customer's CSR, and rejects supplemental orders until the CSR is updated.
18. Qwest must eliminate the cumbersome nature of its OSS and fix other OSS problems as well. Prior to gaining section 271 approval,
 - Qwest must offer migration by name and telephone number

- Qwest must adopt the industry standard version of migrate-as-specified that allows CLECs to list only the features the customer desires from the CLEC, without reference to features and line class codes the customer previously had
 - Qwest must update Customer Service Records more quickly
 - Qwest must improve the intervals in which it provisions UNE-P orders
 - Qwest must improve its flow-through performance
 - Qwest must stop returning jeopardies or rejects that require CLECs to correct orders after Qwest has already transmitted a FOC
 - Qwest must improve its performance in repairing lines
 - Qwest must show that its new CABS BOS billing are accurate and formatted properly
 - Qwest must make its test environment mirror its production environment
- Other BOCs that have received section 271 authorization have not had the same systems issues.

Complexity of Pre-Order and Order Processes

19. The pre-order/order process in Qwest is far more complicated than it is in other regions with respect to basic UNE-P migration orders. In every other region in the country, the CLEC customer service representative can initiate the pre-order process by typing the customer's telephone number into the Customer Service Record ("CSR") inquiry function. The representative can then use the CSR to confirm information discussed with the customer. The representative can then place the order based on the customer's name, telephone number, and the features the customer wishes to have with the CLEC. The representative does not need to include on the order any information about the customer's service address, retail features, retail line class of service, or customer code.

20. In the Qwest region, however, the process is far more complicated. A CLEC must first perform an address validation function before accessing the customer's CSR. Unlike in other regions, the CSR cannot be accessed simply with the customer's telephone number. The customer's full service address must be entered. Because customer service representatives sometimes err in typing addresses, however, and this could lead the representative to pull the wrong CSR, Qwest has told CLECs they should first perform an address validation function before even accessing the CSR. This is an extra step that CLECs do not have to perform for migration orders in other regions. Moreover, the address validation function also requires the typing of the full service address, rather than just the telephone number. In other regions, if a CLEC wishes to use the address validation function, an optional step, only the telephone number is required.
21. Once the customer service representative has typed the address into the address validation function, Qwest will often return multiple addresses. In some cases, the customer's prior addresses will be returned along with his current address. In other cases, the addresses of prior owners of the relevant telephone number will come up. And in still other cases the new addresses of former residents of the entered-address will appear. The customer service representative must then determine the proper address by discussing it with the customer and then pull that address to use in the CSR inquiry.
22. Once the customer service representative has determined the proper address, the representative then performs the CSR inquiry by using that address and the customer's telephone number. Unfortunately, despite requiring CLEC to include the address and telephone number as part of the CSR inquiry, Qwest frequently returns more than one CSR in response to the CSR inquiry. This can include CSRs that used to belong to the

customer, for example. It can also include CSRs of different customers – for reasons that WorldCom does not understand. It appears that Qwest's systems provide multiple CSRs approximately 10% of the time in response to a CSR inquiry.

23. The CLEC must then determine which is the correct CSR. Although there is an indicator on the CSR that says whether that particular CSR is "live" (working), this indicator is not always correct. WorldCom has found instances in which there is more than one CSR listed as live in response to a single CSR inquiry. The CLEC must therefore determine by asking the customer which CSR is correct. Like the steps involved in service address validation, this step adds time to the pre-order stage while the customer is on the line – decreasing the efficiency of the representative and potentially angering the customer.

24. At the moment, this last step is a theoretical one as far as WorldCom is concerned. Because WorldCom (and Z-Tel) had no reason to anticipate that Qwest would return multiple CSRs, the Z-Tel interfaces were not built with the capacity to pull multiple CSRs to the desktops of the WorldCom customer service representatives. For now, when there are multiple CSRs, the representative will get an error message in response to a CSR inquiry. The representative will have to attempt to complete the order based on information available to him from the customer, without access to the CSR, a process that very probably will result in a reject. Z-Tel hopes to complete development work that will allow multiple CSRs to be displayed on the desktops of WorldCom customer service representatives. But this is significant development work that should not have been required. No other ILEC returns multiple CSRs at the pre-order stage.

25. Once the representative finally has pulled the correct CSR, Qwest's ordering process remains cumbersome. Numerous pieces of information must be pulled from the CSR and

placed on the order. None of this information is required by any other BOC for a UNE-P migration order. First, the CLEC must place the complete service address on the order. Second, the CLEC must place the customer's existing line class of service on the order even though the customer will have a different line class of service with the CLEC. There are hundreds of possible line class of services in Qwest. Third, the CLEC must include on the order the customer's existing features if the customer wishes to keep those features as a CLEC customer. If, for example, the customer has caller ID and wishes to keep caller ID, the CLEC must list caller ID as a current feature and as a new feature, along with a code indicating the customer wishes to keep the feature the same. If the customer wants to add an entirely new feature, the CLEC must include a code indicating the feature is new. If the CLEC treats an existing feature as a new feature or a new feature as an already-existing one, the order will reject. Thus, the CLEC must determine which features are already on the account and place the proper codes on the order to show which of these features the customer wishes to keep and which new features he would like to add.

26. Fourth, the CLEC must place a "customer code" on each order. Apparently, Qwest assigns each retail customer a unique customer code and the CLEC must place this code on a migration order for it to be processed correctly. Again, this unnecessary piece of information must be retrieved from the CSR and any difficulty in transferring this information to the order (or any internal Qwest error in placing the code on the CSR) will lead to rejection of the order.
27. Each of these requirements is unique to Qwest. In other regions, CLECs do not have to retrieve a service address using the address validation function prior to entering an order.

If they do perform an address validation, they can do so using a telephone number without entering the address. When CLECs perform a CSR inquiry in other regions, only one CSR is retrieved. Moreover, integration of pre-order and order is much simpler because CLECs do not need to pull significant information from the CSR to place a basic migration order. They do not have to include a line class of service, or existing features, or the customer code on an order. They also do not need to include the service address. Thus, none of these pieces of information is a source of possible rejects. In the Qwest region, in contrast, the CLEC must either retype all of this information onto the order, an extremely cumbersome task that is fraught with the possibility of error, or must develop the software to take the features from the CSR and pre-populate them on the order. If the integration is not fully successful, the order will be rejected. If the information that the CLEC pulls from the CSR is incorrect, because Qwest has made mistakes in updating the CSR, the order will also be rejected.

28. The requirements in Qwest cause several difficulties for CLECs. First, they force CLEC customer service representatives to spend too much time on the line with customers. Performing an address validation function, choosing among multiple addresses, and potentially choosing among multiple CSRs while the customer is on the line adds significant time to the pre-order process. It is vital for CLECs in a mass market environment to be able to reduce the time that customer service representatives spend on the phone with each customer..
29. Second, the complexity of Qwest's systems adds significantly to CLEC development costs. The complexity has made it far more difficult to develop integrated pre-order and

order functions. It is also forcing Z-Tel to work with its vendors to develop a method of displaying multiple CSRs on the desktops of customer service representatives.

30. Third, the complexity is a direct cause of the high reject rate. If the CLEC does not choose the correct address through the address validation function or the correct CSR through the CSR inquiry, the order will reject. It also appears that Qwest will reject an order if the CLEC has not performed a required pre-order function, such as address validation, even if the CLEC places the proper information on the order. The need to include a service address, line class of services etc. also makes it much more difficult to integrate pre-order and order successfully.
31. In its test of a CLECs' capability to integrate pre-ordering and ordering interfaces in the Qwest region, Hewlett Packard ("HP") found hundreds of inconsistencies between pre-order and order requirements, including inconsistent business rules, inconsistent valid values and inconsistent data types. LN-OSS 12 at 9, 25-27.³ HP also found other issues such as return of the Billing Section as a concatenated street field, LN-OSS 12 at 37, Qwest's failure even to return information at the pre-order stage for several industry standard fields, LN-OSS 11 at 39-40, 45-46, and 41 CSR related issues LN-OSS 12 at 37. Although HP concluded that these issues "are not critical enough to prevent an established CLEC, with a professional EDI development team, from being successful in its effort to build a PreOrder to Order integration system, HP concluded that such issues "could present a CLEC many challenges." LN-OSS 12 at 9, 25-27.
32. But there is no reason that Qwest should make integration so difficult. In constructing the interfaces used to place WorldCom/Z-Tel orders, Accenture did attempt to integrate

pre-order and order. But the complexity of Qwest's pre-order/order processes makes integration far more difficult than in other regions. The complexity of Universal Service Order Code and class of service information required for features has contributed to the high reject rates WorldCom is experiencing. As noted, WorldCom's reject rate remains more than 30%. The "successful integration" demanded by this Commission remains out of reach. GA/LA Order ¶ 119.

33. In its evaluation of the Qwest I application, the DOJ noted the high reject rate in the Qwest region, DOJ Qwest I Eval. at 14-15, but suggested the reject rate was similar to that which existed in BellSouth. DOJ Qwest I Eval. at 15 n. 61 (citing *Ga/La Order* App. B at 14-15). However, the BellSouth numbers actually show reject rates of between 12.75% and 14.33% on UNE-P mechanized orders in the last three months for which BellSouth provided data during its application. *Id.* BellSouth's reject rate for partially mechanized UNE-P orders was approximately equal to the rate of rejection in the Qwest region for overall UNE-P orders, including mechanized orders. Thus, the overall reject rate in BellSouth was much lower than the reject rate in Qwest. Moreover, in the BellSouth region, unlike the Qwest region, WorldCom's reject rate was similar to that WorldCom experienced in other regions by the time BellSouth filed the applications that ultimately received approval.
34. At least as important, Qwest cannot blame CLECs for the high reject rates that exist in the Qwest region. First, Hewlett Packard itself experienced very high reject rates during testing, demonstrating, at a minimum, that it is not easy even for an experienced IT team to develop interfaces with a low reject level. Second, the fact that WorldCom's reject

³ All citations of the form LN-OSS xx are cites to the exhibits attached to the Nostriani/Doherty

rates are much higher in the Qwest region than elsewhere strongly suggest that Qwest is responsible. Third, as the DOJ noted, DOJ Qwest I Eval. at 16, the fundamental causes of high reject rates in the Qwest region were not present in prior applications: the requirement to include a service address on every order, the requirement to list a customer's existing features on every order, and the other systems issues discussed above. The DOJ did not resolve these issues, instead stating that it would evaluate the integration issues as relevant to the degree and adequacy of manual handling. DOJ Qwest I Eval. at 16. But in reality, the primary impact of high reject rates caused by Qwest's deficient OSS is on the CLECs' side of the interface. It is the CLEC that must spend time and effort attempting to correct the rejects and resubmit them. It is the CLECs' customers whose orders are delayed as a result.

35. In its Reply Comments in the Qwest I proceeding, Qwest suggests that some CLECs have managed to achieve relatively low reject rates. Qwest then provides reject rates for a few CLECs in individual states. But Qwest does not provide their overall reject rate region wide, does not say how many orders they have submitted, and does not say what type of orders they have submitted.

36. In *ex parte* filings on July 25 and July 26 concerning the Qwest I application, Qwest indicates that during the third-party test, Hewlett Packard managed to successfully integrate pre-order and order functions and that a CLEC called New Access did so commercially. But the reject rate Qwest provides in its *ex parte*, at least with respect to Hewlett Packard, and presumably with respect to New Access as well, pertains to fatal

rejects only, not non-fatal error messages. As for fatal rejects, the *ex parte* actually shows a very high percentage of fatal rejects, which are ordinarily quite low.

37. Moreover, the total percentage of orders returned to Hewlett Packard for correction is provided in the test report and was well over 30% -- 33.6% in the Eastern region, 40.5% in the Central region, and 32.1% in the Western region, using interfaces that ostensibly had been integrated. Even if the errors did not result from integration issues per se, the complexity of Qwest's requirements surely contributed significantly. If Qwest did not require transmission of address information, for example, there would be no address errors. See, e.g., Ga/La Order ¶ 125.

38. As for New Access, I do not know how many orders New Access has placed or what its mix of orders is or what its reject rate is when non-fatal rejects are included. But it is likely that the order volume is low and that it includes resale orders rather than UNE-P orders. Moreover, New Access did not even complete integration until June, hardly sufficient time to evaluate reject rates.

39. Qwest also refers to letters of Telcordia and Nightfire claiming they have built integrated interfaces. But there is no evidence that any CLEC is using those interfaces successfully with a low reject rate.

40. Indeed, it is clear that for most CLECs the complexity of Qwest's systems continues to cause significant problems, resulting in very high average reject rates. The reject rate in the Qwest region is simply too high and there is no immediate prospect of any change.⁴

⁴ The reject rate on supplemental orders WorldCom submits to correct rejects is also extremely high in the Qwest region, adding to the difficulty of serving customers. While the "re-reject" rate is high everywhere that WorldCom is submitting orders through Z-Tel systems, it is much higher in the Qwest region than elsewhere. In June, the "re-reject" rate was a staggering 77.8% in the Qwest region as compared with 54.7% on orders submitted through Z-Tel in other states.

41. Two key OSS changes would significantly reduce most of these problems. Qwest should enable CLECs to place orders based on customer name and telephone number – without the need for a service address or customer code. And Qwest should adopt the industry standard version of migration as specified – in which a CLEC need list only the features a customer desires in the future – without regard for whether the customer already has those features or the customer’s existing line class of service. These changes would eliminate the need for a CLEC to perform an address validation on a UNE-P migration order, would make pre-order/order integration far simpler, and would significantly mitigate the harm caused by Qwest’s return of multiple CSRs. (Of course, it would be better still if Qwest also cleaned up its databases and stopped returning multiple CSRs.)
42. Neither of the changes would require much effort from Qwest. Other BOCs were able to implement migration by name and telephone number (or a slightly different variant – migration by name and street number) quickly once they decided to do so. Verizon early on offered migration by name and telephone number. Similarly, when CLECs suggested during the Texas 271 process that migration by telephone number would be of significant assistance, SBC implemented this change relatively quickly. In approving SWBT’s section 271 application in Texas, the FCC noted that this enhancement “provides assurances that carriers that have yet to attempt integration should be able to avoid the burden of receiving and processing a large number of address-related rejects.” TX Order ¶ 160. Finally, BellSouth implemented migration by telephone number (and street address number) less than three months after being ordered to do so.

The week of July 7-12, the re-reject rate was 88.0% in the Qwest region compared with 60.1% elsewhere.

43. Other BOCs also have all implemented ordering processes that required CLECs to list only the customer's new features on migration orders – the industry standard version of “migrate as specified.” They did so early in the process of OSS development. This should be particularly easy for Qwest, because it previously employed just this process. But in an anti-competitive move ostensibly designed somehow to help CLECs, Qwest subsequently adopted the much more complex ordering process it uses today.
44. Because it is critical that Qwest allow CLECs to migrate by TN and the industry standard version of “migrate as specified,” WorldCom, and its partner Z-Tel, have submitted change requests for Qwest to implement this functionality. Although WorldCom did not submit these change request until recently, Qwest should long have been aware of their importance to CLECs. Migrate by TN functionality was discussed in this Commission's Texas Order ¶160, as well as its Georgia/Louisiana Order. And migrate as specified is the industry standard version of ordering employed by all other BOCs.
45. CLECs have now prioritized the industry standard version of migration as specified second in change management. They have prioritized migration by name and telephone nineteenth. In addition, CLECs prioritized third an AT&T request that would enable CLECs to retrieve CSRs without entering the customer's name and address. Each of these change requests is critical and must be implemented before Qwest gains section 271 authority.
46. But Qwest will not implement any of the prioritized changes until April 2003. Moreover, WorldCom's change request for migration by name and telephone number may well not make it into the April 2003 release and may be postponed until August 2003 or even later. Although CLECs prioritized the request quite high – nineteenth – there may be

insufficient release space in April for this change to make it into the release. Presumably, the reason that CLECs did not prioritize the change even higher is that many smaller CLECs primarily desired changes necessary to facilitate ordering via the IMA GUI, rather than EDI, especially since Qwest indicated that the migration by name and telephone number functionality would take significant release space.

47. This should not obviate the necessity for Qwest to implement migration by name and TN prior to gaining section 271 authority. The fact that there are also significant limitations in Qwest's IMA GUI that smaller CLECs want fixed (e.g., Eschelon Comments at 6-7 (discussing cumbersome nature of GUI) should not eliminate Qwest's obligation to make changes necessary for effective ordering by larger CLECs via EDI. At present, the complexities of Qwest's pre-order/order process deny such CLECs a meaningful opportunity to compete. CLECs must expend too many resources developing interfaces, talking on the phone with customers, and correcting rejects to be able to compete effectively.

Difficulties in Placing Orders for Account Maintenance

48. The complexity of Qwest's systems not only makes it difficult for CLECs to place initial orders. It also makes it difficult for CLECs to place orders to change features or perform other "account maintenance." A CLEC should not have to access Qwest's systems at all to place such orders because the customer's address information and other information has already been imported into the CLEC's systems. Nonetheless, Qwest forces CLECs to perform pre-order functions even on these "Move, Add, Change, Delete" or "MACD" orders.